

## REMARKS

1. With respect to the rejection of claim 1 and 17 under 35 USC §112, second paragraph, it is respectfully submitted that the "writing start area" is adequately defined. As noted, claim 1 recites a "handwriting input area" that includes a "writing start area", the "writing start area is substantially smaller than said handwriting input area" and "a visual indication of said writing start area" is provided on the display screen. In the specification, reference is made to "handwriting input area 270." (see e.g. para. 0069; Figure 2). The "handwriting start area 280" is referred to in para. 0070. (See also Figure 2). An example of the "visual indication" of the start area 280 is shown in Figure 2. It is also stated in para. 0042 of the specification that the writing start area may be shown as a little square or rectangular box with a different visual appearance than that of the background/ handwriting input area.

It is also stated in the specification, para. 0042, that the writing start area may have an adaptive "location" within said handwriting input area and that the adaptive location is adjusted depending on the current cursor position. This is an alternative embodiment, adequately described, which is within the scope of the pending claims. Therefore, it is respectfully submitted that the claimed subject matter is adequately described.

2. Claims 1-4, 6-12 and 15-23 are not unpatenable over Matsuura in view of Ebrahimi under 35 USC§103(a). The combination of Matsuura and Ebrahimi does not disclose or suggest at least that a handwriting input area includes a writing start area, and wherein said writing start area is substantially smaller than said handwriting input area, or a processing device configured to interpret the user input as a symbol only if the user input starts within said writing start area, and the user input ends anywhere within the handwriting input area.

First, Matsuura does not disclose or suggest a handwriting input area that includes a "writing start area" as is recited by Applicant in the claims. Matsuura only discloses a handwriting input area *as such*. Items 241-244 of Fig. 1, referred to by the Examiner in support of this feature, are software keys (*see*, para. 0023). Various functions used for

dynamic sentence input can be assigned to these software keys. (para 0025). Matsuura discloses, in paragraph 0025 that the "software keys" 241-244 are placed at peripheral positions not to overlap the "screen central part" which functions as both a character display area and a handwriting area. Matsuura clearly distinguishes the "software keys" 241, 242, 243, 244 from the handwriting area. There is no disclosure or suggestion in Matsuura that these "software keys" comprise a "writing start area" as described and claimed by Applicant.

The combination of Matsuura and Ebrahimi cannot disclose or suggest a "writing start area" that is substantially smaller than the "handwriting input area." As noted above, Matsuura does not disclose or suggest a "writing start area" as is claimed by Applicant. Ebrahimi discloses a number of writing boxes 12. (Col. 1; lines 65-66; Fig. 1). As shown in FIG. 1, the writing areas 12 are the same size and a fixed size. There is no disclosure or suggestion that a writing start area is substantially smaller than the handwriting input area as claimed by Applicant. The Examiner refers to FIGS. 2 and 3, references 44 and 46. However, it is clearly evident from viewing these figures that the writing areas 42 are for a fixed size and constant location. The characters 44 and 46 are within the writing areas 42. (Col. 3, lines 26-29). There is no disclosure that the start area is considerably or substantially smaller than the handwriting input area. Thus, since neither reference discloses at least these features, their combination cannot as well.

The combination of Matsuura and Ebrahimi also does not disclose or suggest a display device where the processing device is configured to interpret the user input as a symbol only if the user input starts within the writing start area and ends anywhere within the handwriting input area. Ebrahimi discloses a graphical handwriting recognition user interface including a display, one or more areas designated on the display for enabling entry of handwritten information using a stylus and an image of a character being displayed within the one or more areas designated for entering the handwritten information. In Ebrahimi, the user can only write in one box or another, for a single character. Col. 2, lines 5-12 states that when two handwriting boxes are provided,

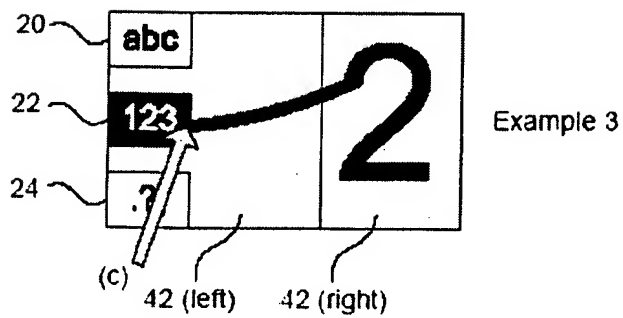
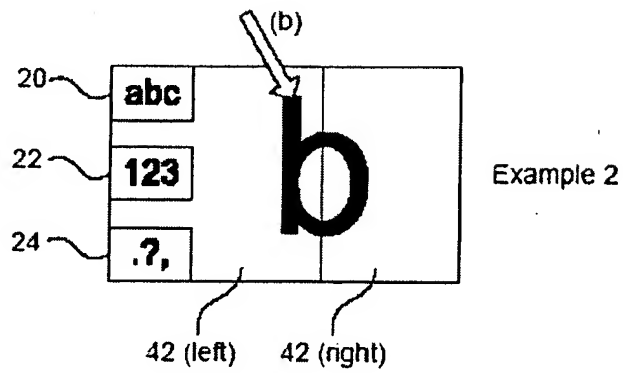
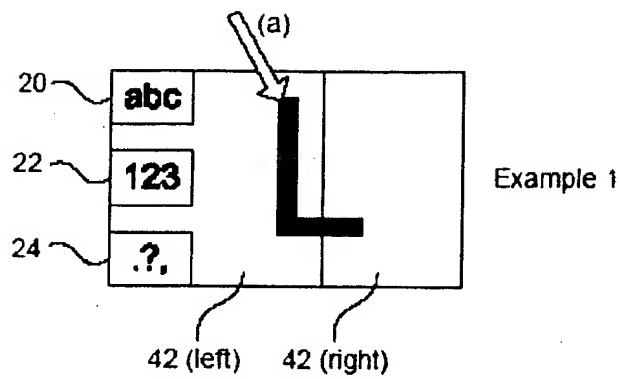
handwriting boxes allow the user to immediately begin printing the "next character" in the "second" of the handwriting boxes, or wait for the handwriting recognition application to recognize the printing and the current handwriting box, and "then" clear the current handwriting box. However, claim 1 recites that the user starts within the writing start area and ends "anywhere" within the handwriting input area.

Ebrahimi does not distinguish between a writing start area and the handwriting input area as claimed by Applicant. As a first example (Example 1 attached), assume that area 42 (left) defines the writing start area. It is thus assumed that the user starts inputting a symbol in the writing start area 42 (left) as indicated by the arrow (a). Assume further that the user finishes inputting the symbol in the area 42 (right), i.e. outside the thus defined writing start area. Ebrahimi teaches that when two handwriting boxes are provided as shown, the handwriting boxes allow the user to immediately begin printing the next character in the second of the handwriting boxes (*see*, column 2, lines 5-8). Hence according to the teachings of Ebrahimi, the two areas 42 (left) and 42 (right) define two separate and thus independent input areas. Therefore, if the user starts inputting a symbol in the area 42 (left) and finishes inputting the symbol in the area 42 (right) the device according to Ebrahimi et al. interpret this symbol as two different and independent symbols.

As a second example (Example 2 in the appended drawing), assume again that area 42 (left) defines the writing start area and hence that the user starts inputting the symbol in the area 42 (left) as indicated by the arrow (b). Assume further that during the input of the symbol the user crosses the line separating area 42 (left) from area 42 (right) and then the user finishes inputting the symbol in the area 42 (left). Hence, with reference to the passage cited above (i.e., column 2, lines 5-8) the device according to Ebrahimi will interpret this symbol as three different and independent symbols (the first symbol in area 42 (left), the second symbol in area 42 (right) and the third symbol in area 42 (left)).

As a third example (Example 3 in the appended drawing), assume that the user starts input a symbol in one of the areas 20, 22, 24, such as the area 22 as indicated by the arrow (c) and then continuous to write a symbol in the area 42 (right). Hence, with reference to the passage cited above (*see*, column 2, lines 5-8) the device according to Ebrahimi et al. interpret this symbol as two different and independent symbols (the first symbol in area 42 (left) and the second symbol in area 42 (right)).

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Ebrahimi also does not teach separating the writing start area from the handwriting input area as recited in claim 1. Ebrahimi only discloses conventional writing areas, such as the writing areas 12, 42 (left), 42 (right) of Figs. 1-5.

Ebrahimi also teaches that the plurality of buttons used to select the plurality of writing modes can be conventional soft keys displayed on the display, or can be conventional buttons disposed in an area of the housing adjacent to the display (*see*, column 3 line 66 to column 4 line 3). The areas 20, 22, 24 defining the writing mode cannot correspond to a writing start area as recited by Applicant in the claims. Further, since the plurality of buttons used to select the plurality of writing modes can be conventional buttons disposed in an area of the housing Ebrahimi teaches away from the claimed invention.

There is also no motivation to combine Matsuura with Ebrahimi for purposes of 35 USC §103(a). To establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings. The Examiner merely speculates as to a "useful feature" of Ebrahimi. What is this "useful feature" and how can it be combined with Matsuura? Absent any teaching or suggestion, it is submitted that a *prima facie* case of obviousness is not established.

According to the claimed invention there is provided an apparatus for handwriting recognition, the apparatus *inter alia* comprising a handwriting input area which includes a writing start area. The writing start area is substantially smaller than the handwriting input area, and a processing device of the apparatus is configured to interpret the user input as a symbol only if the user input starts within said writing start area and ends anywhere within the handwriting input area. Such a writing start area facilitates for rapid text input by a user. Further, such a writing start area facilitates for improved handwriting recognition since the handwriting recognition engine only needs to be started in case user input is entered in the writing start area. Applicant's claimed

subject matter has the advantage of providing a well-defined writing start area and simultaneously providing a larger handwriting input area. No such features or advantages can be found in or provided by the proposed combination of references.

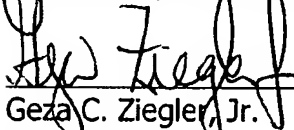
Claim 1 is therefore non-obvious in view of Matsuura and Ebrahimi. For the same reasons, *mutatis mutandis*, claim 17 is non-obvious in view of Matsuura in view of Ebrahimi.

Claims 2-4, 6-12, 15-16, and 18-23 are also not obvious at least in view of their respective dependencies.

3. Claims 13, 14, 24 and 25 are not unpatentable over Matsuura in view of Ebrahimi and further in view of Dutta at least by reason of their respective dependencies.

The Commissioner is hereby authorized to charge any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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